

**BRUSHWELLMAN**  
ENGINEERED MATERIALS

Brush Wellman Inc.  
67 West 2950 South  
Salt Lake City, Utah 84115  
Phone 801/467-5441

April 23, 1981

File ACT/023/c  
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**RECEIVED**

APR 27 1981

DIVISION OF  
OIL, GAS & MINING

Mr. Chuck Horsburgh  
Minerals Specialist  
Bureau of Land Management  
Richfield District Office  
150 East 900 North  
Richfield, Utah 84701

Re: Plan of Operations, Brush Wellman's  
Beryllium Mining Operations, Juab  
County, Utah

Dear Mr. Horsburgh:

Submitted herewith pursuant to Subpart 3809 of Title 43 of the Code of Federal Regulations is a plan of operations covering Brush Wellman's beryllium mining operations in Juab County, Utah. Brush Wellman has been mining beryllium ores at this site for many years, and expects to continue such mining for the foreseeable future. In connection with its ongoing mining operations, some years ago Brush Wellman made the requisite mining operations and reclamation filings pursuant to the Utah Mined Land Reclamation Act with the Utah State Division of Oil, Gas and Mining, which filings were approved ("tentative approval") March 22, 1977. Recently, in part to reflect a recent property acquisition and certain minor changes in the scope of Brush Wellman's operations, and in part to provide a basis for the filing of a plan of operations pursuant to Subpart 3809, Brush Wellman filed a revised set of documents as permitted under the Utah Mined Land Reclamation Act with the Division of Oil, Gas and Mining. This revised filing received reaffirmation of tentative approval from the Division of Oil, Gas and Mining on April 7, 1981.

Because of the similar nature of the requirements under the Utah Mined Land Reclamation Act and the Subpart 3809 Surface Management Regulations, Brush Wellman hereby submits for your approval as a plan of operations the materials as filed with and approved



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by the Division of Oil, Gas and Mining pursuant to the Utah Mined Land Reclamation Act, and certain other information, all as described below. These materials include the name and mailing address of the operator, Brush Wellman Inc.; three maps showing access, areas of surface disturbance, and other matters; a list of the names of Brush Wellman's mining claims as recorded pursuant to Subpart 3833 of Title 43 of the Code of Federal Regulations; descriptive information concerning Brush Wellman's mining activities; and measures to be taken to prevent unnecessary or undue degradation and measures to reclaim disturbed areas resulting from the proposed operations. Brush Wellman has not submitted a description of measures to be taken during extended periods of non-operation, for the reason that Brush Wellman does not at this time anticipate in the foreseeable future any such period of non-operation.

The documents and materials attached hereto include the following:

(i) Letter from Mr. James W. Smith, Jr., Coordinator of Mined Land Development, Utah State Division of Oil, Gas and Mining, to Brush Wellman dated April 7, 1981 in which the Division of Oil, Gas and Mining signified that Brush Wellman's mining and reclamation plan remains in concert with the Utah Mined Land Reclamation Act.

(ii) Letter from the Division of Oil, Gas and Mining to Brush Wellman dated March 22, 1977, in which the Division of Oil, Gas and Mining signified that Brush Wellman's mining and reclamation plan is in concert with the Utah Mined Land Reclamation Act. The Division of Oil, Gas and Mining granted tentative approval of the mining and reclamation plan on this date.

(iii) Letter from Brush Wellman to the Division of Oil, Gas and Mining dated February 3, 1981 by which Brush Wellman submitted its revised notice of intention, and revised mining and reclamation plan, together with three maps. It was this submittal which was reviewed by the Division of Oil, Gas and Mining and which resulted in the letter of April 7, 1981 described above.

(iv) Brush Wellman's MR-Form 1 "Notice of Intention to Revise Mining Operations" dated February 3, 1981 as submitted to the Division of Oil, Gas and Mining.



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(v) Brush Wellman's MR-Form 2 "Mining and Reclamation Plan--Revised" dated February 3, 1981 as submitted to the Division of Oil, Gas and Mining.

(vi) Three maps depicting the mining properties, mining operations, and road system as described in the February 3, 1981 letter described above.

(vii) Brush Wellman's MR-Form 8 dated August 14, 1978 in which Brush Wellman committed to comply with Rule M-10 "Reclamation Standards" in their entirety as adopted by the Board of Oil, Gas and Mining on March 22, 1978.

(viii) A list of the names of Brush Wellman's mining claims as recorded with the Bureau of Land Management pursuant to Subpart 3833 of Title 43 of the Code of Federal Regulations.

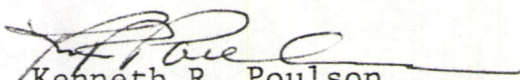
As indicated by the April 7, 1981 letter referred to in subparagraph (i) above, the Division of Oil, Gas and Mining has not yet determined the amount, if any, and the form of the surety to cover the estimated cost of reclamation. Brush Wellman intends to continue to work with the Division of Oil, Gas and Mining concerning their surety requirement. In the interim, Brush Wellman would like to request that the Bureau of Land Management delay any determination of the need for a bond until the surety requirement under the Utah Mined Land Reclamation Act has been determined.

Brush Wellman hereby requests pursuant to 43 C.F.R. §3809.5 that you maintain the map identified as "Plate 1" "Topaz Mining Properties" (see letter dated February 3, 1981) as unavailable for public examination, as it contains confidential or privileged commercial or financial information.

If you have any questions concerning any of the materials hereby submitted by Brush Wellman, or if we may be of further assistance, please do not hesitate to let me know.

Very truly yours,

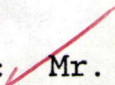
BRUSH WELLMAN INC.

  
Kenneth R. Poulson  
Vice President  
Mining & Exploration

KRP:jd  
Enclosures



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cc:  Mr. James W. Smith, Jr.  
Coordinator of Mined Land Development  
State of Utah  
Department of Natural Resources  
Division of Oil, Gas and Mining  
1588 West North Temple  
Salt Lake City, Utah 84116

Mr. Donald R. Pendleton  
District Manager  
Bureau of Land Management  
150 East 900 North  
Richfield, Utah 84701